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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE RICARDO LOPEZ-MUNOZ,
aka "Juan De Santiago,"
aka "Juan Lopez- Larios,"
aka "Jesus Lopez,"
aka "Ricardo Leneave,"
aka "Ricardo Munoz,"
aka "Juan Munoz Castrejon,"
aka "Jesus Lopez Larios,"
aka "Juan Castejon Larios,"
aka "Jose Lartos,"
aka "Juan Larios Fernandez,"
aka "Fransico Huerta DeAnda,"
aka "Jose Ricardo Lopez-Lopez,"
aka "Ricardo Muniz Martinez,"
aka "Jose Mendoza,"
aka "Juan Jose Mendoza,"
aka "Ricardo Nunez,"
aka "Jose Soltero,"
aka "Alfredo Villanueva,"

Defendant.

Case No. 2:25-mj-00180-NJK

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

1 IT IS HEREBY STIPULATED AND AGREED, by and between Sigal Chattah,
2 United States Attorney, and Clay Plummer, Special Assistant United States Attorney,
3 counsel for the United States of America, Rene L. Valladares, Federal Public Defender,
4 and Ron Sung, Assistant Federal Public Defender, counsel for defendant
5 JOSE RICARDO LOPEZ-MUNOZ, that the Court direct the U.S. Probation Office to
6 prepare a report detailing the defendant's criminal history.

7 This stipulation is entered into for the following reasons:

8 1. The United States Attorney's Office has developed an early disposition
9 program for immigration cases, authorized by the Attorney General pursuant to the
10 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
11 extended to the defendant a plea offer in which the parties would agree to jointly request an
12 expedited sentencing immediately after the defendant enters a guilty plea.

13 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
14 history until after the defendant enters his guilty plea unless the Court enters an order
15 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
16 a defendant's initial appearance when charged by indictment.

17 3. The U.S. Probation Office informs the government that it would like to begin
18 obtaining the criminal history of defendants eligible for the early disposition program as
19 soon as possible after their initial appearance so that the Probation Office can complete the
20 Presentence Investigation Report by the time of the expected expedited sentencing.

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4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 14 day of April, 2025.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

SIGAL CHATTAH
United States Attorney

/s/ [Signature]
Assistant Federal Public Defender
Counsel for Defendant
JOSE RICARDO LOPEZ-MUNOZ

/s/ Clay Plummer
CLAY A PLUMMER
Special Assistant United States Attorneys

Ron Siny

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**Order Directing Probation to
Prepare a Criminal History Report
[Proposed]**

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 15th day of April, 2025.


HONORABLE NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE